

EXHIBIT A

FUNCTION = INQUIRE

Case number : 17-C-1588

Action Log

DANIEL LEE MORRIS vs. GREENWOOD, INC.

Line	Date	Action / Results
1	11/17/17	# CASE INFO SHEET; COMPLAINT; ISSUED SUM & 3 CPYS; F FEE; RCPT
2		# 556499; \$230.00
3	11/27/17	# LET FR SS DTD 11/21/17; SUM W/RET (11/21/17 SS) AS TO
4		# GREENWOOD INC
5	11/28/17	# E-CERT FR SS AS TO GREENWOOD INC DTD 11/25/17
6	12/11/17	# SUM W/RET (11/28/17 SP) AS TO KENNY STEEN
7	12/11/17	# NOT OF BONA FIDE DEF OF KENNY STEEN W/COS

C=Chg D=Del 1-4=Scr M=Menu T=Chg Line# PgUp PgDn P=Prt A=Add I=Image



Registered Agent Solutions, Inc.
Corporate Mailing Address
1701 Directors Blvd.
Suite 300
Austin, TX 78744
Phone: (888) 705-RASi (7274)

SERVICE OF PROCESS RECEIPT

11/27/2017

Chris Hemmings
Greenwood, Inc.
160 Milestone Way
Greenville, SC 29615 USA

NOTICE OF CONFIDENTIALITY

This notice and the information it contains are intended to be a confidential communication only to the individual and/or entity to whom it is addressed. If you have received this notice in error, immediately call our SOP Department at (888) 705-7274.

RE: Greenwood, Inc.

This receipt is to inform you that Registered Agent Solutions, Inc. has received a Service of Process on behalf of the above-referenced entity as your registered agent and is hereby forwarding the attached document(s) for your immediate review. A summary of the service is shown below; however, it is important that you review the attached document(s) in their entirety for complete and detailed information.

SERVICE INFORMATION

Service Date: 11/27/2017
Service Time: 4:49 PM EST
Service Method: Mail (Certified)

RASi REFERENCE INFORMATION

Service No.: 0074204
RASi Office: West Virginia
Rec. Int. Id.: AXS

CASE INFORMATION

Case Number: 17-C-1588
File Date: 11/17/2017
Jurisdiction: KANAWHA COUNTY CIRCUIT COURT, WEST VIRGINIA
Case Title: DANIEL LEE MORRIS V. GREENWOOD, INC. AND KENNY STEEN

ANSWER / APPEARANCE INFORMATION

30 days (Be sure to review the document(s) for any required response dates)

AGENCY / PLAINTIFF INFORMATION

Firm/Issuing Agent: CARBONE & BLAYDES, P.L.L.C.
Attorney/Contact: MARK W. CARBONE
Location: West Virginia
Telephone No.: 304-342-3650

DOCUMENT(S) RECEIVED & ATTACHED

Complaint
Summons
Demand for Jury Trial
OtherDetail: CIVIL CASE INFORMATION SHEET

ADDITIONAL NOTES

Questions or Comments... Should you have any questions or need additional assistance, please contact the SOP Department at (888) 705-7274.

You have been notified of this Service of Process per your default account instructions. RASi offers several methods of notification including Telephone Notification, Email Notification, Online Insta-SOP Delivery, and FedEx/US Postal Service Delivery. If you would like to update your account's default notification methods or view Service of Process information, log into your online account at www.rasi.com.

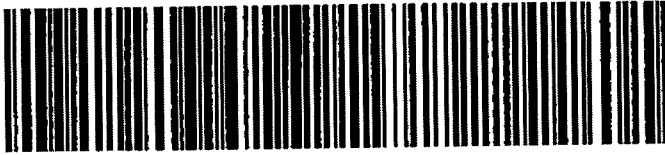
Thank you for your continued business!

Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305



Mac Warner
Secretary of State
State of West Virginia
Phone: 304-558-6000
886-767-8683
Visit us online:
www.wvsos.com

USPS CERTIFIED MAIL™



9214 8301 1251 3410 0002 1919 76

GREENWOOD, INC.
REGISTERED AGENT SOLUTIONS INC.
555 POCA RIVER ROAD NORTH
POCA, WV 25159

Control Number: 206207

Defendant: GREENWOOD, INC.
555 POCA RIVER ROAD NORTH
POCA, WV 25159 US

Agent: REGISTERED AGENT SOLUTIONS
INC.

County: Kanawha

Civil Action: 17-C-1588

Certified Number: 92148901125134100002191976

Service Date: 11/21/2017

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in the name and on behalf of your corporation.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in the name and on behalf of your corporation as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

A handwritten signature in cursive script that reads "Mac Warner".

Mac Warner
Secretary of State

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

DANIEL LEE MORRIS,

Plaintiff,

v.

Civil Action No. 17-C-1588

GREENWOOD, INC., and
KENNY STEEN, an individual,

Defendants.

SUMMONS

To the above-named Respondent:

GREENWOOD INC.
c/o Registered Agent Solutions, Inc.
555 Poca River Road, North
Poca, WV 25159

ACCEPTED FOR
SERVICE OF PROCESS
2017 NOV 21 P 3:59
SECRETARY OF STATE
STATE OF WEST VIRGINIA

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby summoned and required to serve upon Carbone & Blaydes, PLLC, Petitioner's attorney, whose address is 2442 Kanawha Blvd., E., Charleston, WV 25311, an answer, including any related counterclaim you may have, to the complaint filed against you in the above styled civil action, a true copy of which is herewith delivered to you. You are required to serve your answer within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgement by default will be taken against you for the relief demanded in the complaint and you will be thereafter barred for asserting in another action any claim you may have which must be asserted by counterclaim in the above styled action.

Dated: 11/17/17

Cathy S. Gatson, Clerk

Clerk of Court

By: [Signature]

Deputy Clerk

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

DANIEL LEE MORRIS,

Plaintiff,

v.

GREENWOOD, INC., and
KENNY STEEN, an individual,

Defendants.

FILED

2017 NOV 17 P 2:06
CATHY S. GATSON, CLERK
KANAWHA COUNTY CIRCUIT COURT
Civil Action No.

17-C-1588
Kaufman

COMPLAINT

I. JURISDICTION AND VENUE

1. Plaintiff, Daniel Lee Morris, a former employee of Defendant Green Wood Inc., brings this action to redress the wrongs done to him by way of Defendants engaging in age discrimination.
2. Jurisdiction of this Court is invoked pursuant to the West Virginia Code, §55-2-1, et seq.
3. Venue is appropriate pursuant to West Virginia Code, §56-1-1.

II. PLAINTIFF AND DEFENDANTS

4. Plaintiff Daniel Lee Morris is an individual residing in Kanawha County at 307 Nancy Avenue, Belle, West Virginia, 25015, and over the age of forty (40).
5. Defendant GreenWood, Inc., upon information and belief, is a South Carolina corporation with its corporate headquarters located at 160 Milestone Way, Greenville, South Carolina, with its West Virginia operation located at 437 MacCorkle Avenue, S.W., South Charleston, West Virginia, 25303.
6. Defendant Kenny Steen, upon information and belief, is a resident of Kanawha

County, West Virginia.

III. FACTUAL BACKGROUND

7. Plaintiff incorporates by reference herein the allegations set forth in ¶1-6 above.
8. Plaintiff was an employee of the Defendant GreenWood, Inc. The Plaintiff was employed as an electrician.
9. The Plaintiff worked out of Defendant GreenWood Inc.'s South Charleston, West Virginia, location.
10. On or about May 15, 2017, the Plaintiff was laid off from his employment with Defendant GreenWood, Inc. for lack of work.
11. The Plaintiff was over the age of forty (40) when laid off by Defendant GreenWood, Inc.
12. Defendant Kenny Steen is the Area Project Manager for Defendant's GreenWood Inc.'s South Charleston, West Virginia, operations and was the Plaintiff's ultimate Supervisor. In addition, upon information and belief, Defendant Kenny Steen made the decision to lay off the Plaintiff.
13. At the time that the Plaintiff was laid off, the Defendants retained the employees under the age of forty (40) with less experience than the Plaintiff.
14. At the time of the lay off the Plaintiff was told that when work improved he would be called back. Upon information and belief, the Defendants have been advertising for electricians at the South Charleston facility. The Plaintiff has not been called back to employment.

IV. AGE DISCRIMINATION

15. Plaintiff incorporates by reference herein the allegations set forth in ¶1-14 above.
16. The Plaintiff is a member of a protected class, over the age of forty (40) years.

17. The Defendants, on or about May 15, 2017, laid off the Plaintiff.

18. The Defendants lay off was based on the Plaintiff's age and not loss of work, since the Defendants retain employees that were under the age of forty (40) years and with less work experience.

19. Plaintiff has suffered extreme financial loss proximately caused by the actions of the Defendants.

20. By the actions above, the Defendants engaged in age discrimination against the Plaintiff.

PRAY FOR RELIEF


WHEREFORE, Plaintiff respectfully prays:

1. That Plaintiff be awarded back pay and front pay;
2. That Plaintiff be awarded pre-judgment interest as allowed by law;
3. Grant punitive damages to Plaintiff; and,
4. That Plaintiff be awarded reasonable attorney fees and costs incurred in prosecuting this action; and,
5. That this Court grant Plaintiff any further relief it deems appropriate.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

DANIEL LEE MORRIS,
By Counsel


Mark W. Carbone (WV State Bar #6291)
CARBONE & BLAYDES, P.L.L.C.
2442 Kanawha Boulevard, East
Charleston, WV 25311
(304) 342-3650 telephone
(304) 342-3651 facsimile
wvjustice@aol.com
Counsel for Plaintiff

**CIVIL CASE INFORMATION STATEMENT
CIVIL CASES**

In the Circuit Court of, ~~Kanawha~~ County, West Virginia

FILED

CASE STYLE

2017 NOV 17 P 2:07

Plaintiff(s)

CATHY S. PATSON, CLERK
KANAWHA COUNTY CIRCUIT COURT

DANIEL LEE MORRIS
307 Nancy Avenue
Belle, WV 25015

Case # 17-C-1588

Judge: Kaufman

v.

Defendant(s)

Days to
Answer

Type of Service

GREENWOOD INC.
c/o Registered Agent Solutions, Inc.
555 Poca River Road, North
Poca, WV 25159

30

Corporate

KENNY STEEN, an individual,
c/o **GREENWOOD INC.**
437 MacCorkle Avenue, S.W.
South Charleston, WV 25309

20

Original and _____ copies of complaint enclosed/attached.

Plaintiffs: Daniel Lee Morris Defendants: Greenwood, Inc. & Kenneth Steen	Case Number:
--	---------------------

II. TYPE OF CASE:

- ☒ General Civil
 ☐ Adoption
- ☐ Mass Litigation
 (As defined in T.C.R. Rule XIX (c))
 ☐ Administrative Agency Appeal
- ☐ Civil Appeal from Magistrate Court
- ☐ Asbestos
 ☐ Miscellaneous Civil Petition
- ☐ Carpal Tunnel Syndrome
 ☐ Industrial Hearing Loss
- ☐ Diet Drugs
 ☐ Guardianship
- ☐ Environmental
 ☐ Medical Malpractice
- ☐ Mental Hygiene
- ☐ Silicone Implants
- ☐ Other: _____
- ☐ Habeas Corpus/Other Extraordinary Writ
- ☐ Other: _____

III. JURY DEMAND: ☒ YES ☐ NO

CASE WILL BE READY FOR TRIAL BY (MONTH/YEAR): 12/2018

DO YOU OR ANY OF YOUR CLIENTS OR WITNESSES IN THIS CASE REQUIRE SPECIAL ACCOMMODATIONS DUE TO A DISABILITY? ☐ YES ☒ NO

IF YES, PLEASE SPECIFY

- ☐ Wheelchair
☐ Interpreter or other auxiliary aid for the hearing impaired
☐ Reader or other auxiliary aid for the visually impaired
☐ Spokesperson or other auxiliary aid for the speech impaired
☐ Other: _____

Attorney Name: Mark W. Carbone
 Firm: Carbone & Blaydes, P.L.L.C.
 Address: 2442 Kanawha Blvd., East
Charleston, WV 25311
 Telephone: (304) 342-3650

Representing:
☒ Plaintiff ☐ Defendant
☐ Cross-Complainant ☐ Cross-Defendant

Dated: November 17, 2017



Signature

☐ Proceeding Without an Attorney

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

DANIEL LEE MORRIS,

Plaintiff,

v.

Civil Action No. 17-C-1588

GREENWOOD, INC., and
KENNY STEEN, an individual,

Defendants.

SUMMONS

To the above-named Respondent: **KENNETH STEEN**
c/o GREENWOOD INC.
437 MacCorkle Avenue, S.W.
South Charleston, WV 25309

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby summoned and required to serve upon Carbone & Blaydes, PLLC, Petitioner's attorney, whose address is 2442 Kanawha Blvd., E., Charleston, WV 25311, an answer, including any related counterclaim you may have, to the complaint filed against you in the above styled civil action, a true copy of which is herewith delivered to you. You are required to serve your answer within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgement by default will be taken against you for the relief demanded in the complaint and you will be thereafter barred for asserting in another action any claim you may have which must be asserted by counterclaim in the above styled action.

Dated: 11/17/17

Cathy S. Gatson, Clerk

Clerk of Court

By: J. Bradshaw

Deputy Clerk

**CIVIL CASE INFORMATION STATEMENT
CIVIL CASES**

In the Circuit Court of, Kanawha County, West Virginia

FILED

CASE STYLE

Plaintiff(s)

DANIEL LEE MORRIS
307 Nancy Avenue
Belle, WV 25015

Case #

17-C-1588

Judge:

Kaufman

v.

Defendant(s)

Days to
Answer

Type of Service

GREENWOOD INC.
c/o Registered Agent Solutions, Inc.
555 Poca River Road, North
Poca, WV 25159

30

Corporate

KENNY STEEN, an individual,
c/o GREENWOOD INC.
437 MacCorkle Avenue, S.W.
South Charleston, WV 25309

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- ☐ Silicone Implants
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- ☐ Other: _____

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Attorney Name: Mark W. Carbone
 Firm: Carbone & Blaydes, P.L.L.C.
 Address: 2442 Kanawha Blvd., East
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 Telephone: (304) 342-3650

Representing:
☒ Plaintiff ☐ Defendant
☐ Cross-Complainant ☐ Cross-Defendant

Dated: November 17, 2017

Mark W. Carbone

Signature

☐ Proceeding Without an Attorney

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

DANIEL LEE MORRIS,

Plaintiff,

v.

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KENNY STEEN, an individual,

Defendants.

Civil Action No.

17-C-1588
Kaufman

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PRAY FOR RELIEF

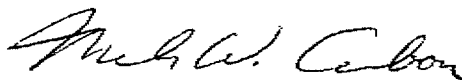
WHEREFORE, Plaintiff respectfully prays:

1. That Plaintiff be awarded back pay and front pay;
2. That Plaintiff be awarded pre-judgment interest as allowed by law;
3. Grant punitive damages to Plaintiff; and,
4. That Plaintiff be awarded reasonable attorney fees and costs incurred in prosecuting this action; and,
5. That this Court grant Plaintiff any further relief it deems appropriate.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

DANIEL LEE MORRIS,
By Counsel


Mark W. Carbone (WV State Bar #6291)
CARBONE & BLAYDES, P.L.L.C.
2442 Kanawha Boulevard, East
Charleston, WV 25311
(304) 342-3650 telephone
(304) 342-3651 facsimile
wvjustice@aol.com
Counsel for Plaintiff



Chase Tower, 17th Floor
P.O. Box 1588
Charleston, WV 25326-1588
(304) 353-8000 (304) 353-8180 Fax
www.steptoe-johnson.com

Writer's Contact Information

(304) 353-8116
Bryan.Cokeley@StepToe-Johnson.com

December 8, 2017

Cathy S. Gatson, Clerk
Circuit Court of Kanawha County
Kanawha County Judicial Annex
111 Court Street
Charleston, WV 25301

Re: *Daniel Lee Morris v. Greenwood, Inc. and Kenny Steen, an individual,*
Civil Action No.: 17-C-1588

Dear Ms. Gatson:

Enclosed please find the original of a **Notice of Bona Fide Defense of Kenny Steen** for filing in the above-referenced matter.

Please mark this document "filed" and place it in the appropriate Court file. A copy of this has been served upon counsel of record.

Thank you for your assistance in this matter.

With warmest regards,

A handwritten signature in black ink that reads 'Bryan R. Cokeley/pjc'. The signature is fluid and cursive.
Bryan R. Cokeley

BRC/pjc
Enclosure
cc (w/enc.): Mark W. Carbone, Esquire

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

DANIEL LEE MORRIS,

Plaintiff,

V.

CIVIL ACTION NO.: 17-C-1588

**GREENWOOD, INC., and
KENNY STEEN, an individual,**

Defendants.

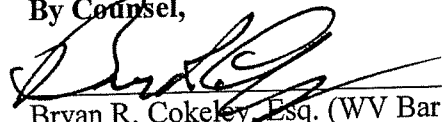
NOTICE OF BONA FIDE DEFENSE OF KENNY STEEN

Please take notice that Defendant Kenny Steen has a bona fide defense, including matters covered by Rule 12(b) of the West Virginia Rules of Civil Procedure, to the Complaint served upon him in this action and that, in accordance with Rule 12(a) of said Rules, his response to said Complaint will be served within thirty (30) days after the date of service.

Dated this 8th day of December, 2017.

KENNY STEEN,

By Counsel,


Bryan R. Cokeley, Esq. (WV Bar No. 774)
Mark C. Dean, Esq. (WV Bar No. 12017)
STEPTOE & JOHNSON PLLC
P.O. Box 1588
Charleston, WV 25326-1588
Telephone (304) 353-8000
Facsimile (304) 353-8180
Jan.Fox@Steptoe-Johnson.com
Mark.Dean@Steptoe-Johnson.com

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

DANIEL LEE MORRIS,

Plaintiff,

V.

CIVIL ACTION NO.: 17-C-1588

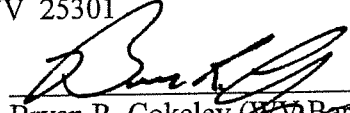
**GREENWOOD, INC., and
KENNY STEEN, an individual,**

Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of December, 2017 I served the foregoing "Notice of Bona Fide Defense of Kenny Steen" with the Clerk of the Court and delivered same to all parties by depositing a true copy thereof in the United States mail, postage prepaid, addressed as follows:

Mark W. Carbone
Carbone & Blaydes, P.L.L.C.
2442 Kanawha Blvd., East
Charleston, WV 25301


Bryan R. Cokeley (WV Bar 774)
Mark C. Dean (WV Bar #12017)